

Message

From: Fennessy, Christopher [christopher.fennessy@Rocket.com]
Sent: 9/20/2017 5:21:37 PM
To: Keller, Lynn [Keller.Lynn@epa.gov]; ROJAS-MICKELSON, DAEWON [rojas-mickelson.daewon@epa.gov]; MacDonald, Alex@Waterboards (Alex.MacDonald@waterboards.ca.gov) [Alex.MacDonald@waterboards.ca.gov]; MacNicholl, Peter@DTSC (Peter.MacNicholl@dtsc.ca.gov) (Peter.MacNicholl@dtsc.ca.gov) [Peter.MacNicholl@dtsc.ca.gov]; jim.rohrer@dtsc.ca.gov
Subject: RE: CAG Schedule Update
Attachments: CAG Handout - Back 09-20-17.xlsx

Revised schedule. I added PP with CEQA and I added ROD with a completion date of the end of September, assuming EPA would want it completed in the fiscal year (also assuming we are working closely enough together that the ROD can be prepared at the same time the final RAP is being prepared). I did not extend the RI since the Final RI has been completed and the investigation is really additional data to support remedy. I did add HHERA to the FS and Draft RAP timeline.

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From: Fennessy, Christopher
Sent: Monday, September 18, 2017 12:20 PM
To: 'Keller, Lynn'; ROJAS-MICKELSON, DAEWON; MacDonald, Alex@Waterboards (Alex.MacDonald@waterboards.ca.gov); MacNicholl, Peter@DTSC (Peter.MacNicholl@dtsc.ca.gov) (Peter.MacNicholl@dtsc.ca.gov); jim.rohrer@dtsc.ca.gov
Subject: RE: CAG Schedule Update

Hi Lynn – We had previously discussed difficulty with meeting an August 2018 schedule due to the need to incorporate data collected through April 2018. Since we all now agree that we no longer need to wait until April to finalize the HHERA and FS, we feel it should be very achievable to meet the August 2018 deadline.

The additional data currently being collected is only going to provide clarification on the extent of remedy. While it may provide a little additional N&E information, that information is not necessary to determine if there is a risk or if remedy is needed. As such, this additional data should not require changes to the RI or HHERA. The Agencies have already approved the final RI. The Agencies have also already approved final responses to comments on the draft HHERA and a final version was submitted in August 2016. Per EPA's request, all that is necessary is a short update to the uncertainty section discussing the change to the vapor intrusion evaluation. We can incorporate that now and submit the revised final HHERA to the Agencies by the beginning of October.

The additional data currently being collected will be folded into the FS and RAP. We anticipate that the revised draft FS will be submitted in November and the draft RAP will be submitted to the Agencies in December. We feel that the Agencies should be able to provide comments on these documents within 30 days. That should provide sufficient time to revise the RAP based upon Agency comments, complete the CEQA process, and finalize the RAP by August 2018.

If there are different views on how to complete this project, we can discuss further during Thursday's technical meeting. Thanks, Chris

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From: Keller, Lynn [<mailto:Keller.Lynn@epa.gov>]
Sent: Friday, September 15, 2017 6:20 PM
To: Fennessy, Christopher; ROJAS-MICKELSON, DAEWON; MacDonald, Alex@Waterboards (Alex.MacDonald@waterboards.ca.gov); MacNicholl, Peter@DTSC (Peter.MacNicholl@dtsc.ca.gov) (Peter.MacNicholl@dtsc.ca.gov); jim.rohrer@dtsc.ca.gov
Subject: [EXTERNAL] RE: CAG Schedule Update

Hi, Chris.

My only comments are on the Area 40 timeline; it shouldn't show the RI as ending in Feb 2016 since data is still being collected through this calendar year to supplement the RI and HHRA. Also, as we've discussed, it doesn't seem realistic to finalize the supplemental RI, HHRA, FS, RAP, and CEQA by Aug 2018. There is no mention of the ROD either, which will still be required (although it will tier off the RAP, we still have to do one). We'll also have to do a PP if the CEQA/RAP process doesn't have a robust enough public involvement component—but hopefully EPA and the State can come up with something that satisfies all three requirements.

Thanks,
Lynn

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From: Fennessy, Christopher [<mailto:christopher.fennessy@Rocket.com>]
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Subject: CAG Schedule Update

Hi Everyone – I have updated the schedule that we provide to the CAG and wanted you to review and comment prior to issuance. If you feel the schedule should be adjusted in any way, please respond to all. Thanks! Chris

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